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December 3, 2001

By Hand Delivery

Magalie R. Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 00-251
In the Matter of ~~the Petition~~ of AT&T Communications of Virginia, Inc., TCG Virginia, Inc., ACC National Telecom Corp., MediaOne of Virginia and MediaOne Telecommunications of Virginia, Inc. for Arbitration of an Interconnection Agreement With Verizon Virginia Inc. Pursuant to Section 252(e)(5) of the Telecommunications Act of 1996

Dear Ms. Salas:

Enclosed please find an original and three (3) copies of the Affidavit of Brian F. Pitkin on the Feeder/Distribution Sizing Issue. This testimony represents the joint resolution of this issue by AT&T/WorldCom and Verizon. The parties agree that the modifications discussed in this filing remedy the feeder/distribution interface sizing error identified at the October 30 hearing. The parties' efforts to remedy this error in no way constitute Verizon's acceptance of the Modified Synthesis Model as an appropriate method of computing the cost of unbundled network elements in this proceeding.

Supporting electronic files are being provided to the Staff and parties.

An extra copy to be stamped and returned is also included.

Please contact me if there are any questions with respect to this filing. Thank you for your consideration in this matter.

Respectfully submitted,

Alan C. Geolot

cc: Dorothy Attwood (8 copies)
John Stanley
Jeffrey Dygert
Catherine Carpino
Katherine Farroba
Counsel of Record

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
Petition of AT&T Communications	)	
of Virginia, Inc., Pursuant	)	**CC Docket No. 00-251**
to Section 252(e)(5) of the	)	
Communications Act, for Preemption	)	
of the Jurisdiction of the Virginia	)	
State Corporation Commission	)	
Regarding Interconnection Disputes	)	
with Verizon-Virginia, Inc.	)	
In the Matter of	)	
Petition of WorldCom, Inc. Pursuant	)	
to Section 252(e)(5) of the	)	
Communications Act for Expedited	)	
Preemption of the Jurisdiction of the	)	**CC Docket No. 00-218**
Virginia State Corporation Commission	)	
Regarding Interconnection Disputes	)	
with Verizon Virginia Inc., and for	)	
Expedited Arbitration	)	

AFFIDAVIT OF BRIAN F. PITKIN ON FEEDER/DISTRIBUTION INTERFACE SIZING ISSUE

1. At the October 30 hearing, AT&T acknowledged an error in the feeder/distribution interface ("FDI") sizing algorithms of the original Synthesis Model that carried over into the Synthesis Model filed by AT&T/WorldCom in this proceeding (the "Model"). Verizon had identified the problem in Maryland proceedings after the submission of Verizon's rebuttal testimony in the Virginia arbitration. The error occurs in the sizing of the feeder side of the FDI; the algorithm undersizes the feeder side by setting the line count to one instead of using the previously calculated line count for the feeder side. See October 30 Transcript at 4328-33.

2. At the hearing, it was agreed that AT&T would file testimony to correct this error, and Verizon would have the right to cross-examine AT&T on that testimony.

3. Subsequent to this agreement, I modified the source code of the Model's sizing algorithms to remedy this error and sent copies of the source code changes and a modified "feeddist.exe" file to Verizon to allow Verizon to run the Model with the revised source code.

4. AT&T/WorldCom and Verizon agree that the modifications contained herein remedy the algorithmic error regarding the sizing of FDIs consistent with the Model's underlying methodology. This does not imply that Verizon agrees with the underlying methodologies of the Model, its FDI sizing algorithms, or the use of the Model to estimate the costs of providing UNEs but does agree that the modifications remedy the computational error associated with the sizing of the FDI.

5. Enclosed are four files that reflect the changes made to remedy the FDI sizing algorithmic error:

FDI Source Code Correction.ppt -	This file presents the change to the tech.pas source code (the source code that contains the FDI sizing algorithm).
Tech_Old.pas -	The original tech.pas source code used in the Virginia filings.
Tech_New.pas -	The modified tech.pas source code that remedies the FDI sizing algorithm error.
FeedDist.zip -	A compressed version of the new executable file that remedies the FDI sizing algorithm error.

6. Consistent with my October 30, 2001 testimony (Tr. at 4329-30), these modifications add approximately $0.10 to the loop cost.

7. This concludes my affidavit.

BRIAN F. PITKIN

FDI SIZING FIX

Tech.pas

```
60      d26  : double;
61      f26  : double;
62      lt1  : double;

*
*
*

128  for n := 1 to NumXCBoxSizes do
129      if l26  >= IntfcCost[n]^.NumLines
130      then d26 := IntfcCost[n]^.NumLines; { D-side cable size }
131
132
133      f26 :=
           SA_array^[i]^.ResLines/fill_factor_fn(SA_array^[i]^.density,0) +
134            (SA_array^[i]^.BusLines - (one -
           PairsPerT1System/ChannelsPerT1System)*SA_array^[i]^.Switche
           dDS1 +
135          SA_array^[i]^.SpclAccessLines - (one -
           PairsPerT1System/ChannelsPerT1System)*SA_array^[i]^.SpclAcc
           essDS1)/
136            fill_factor_fn(SA_array^[i]^.density,0);
137
138      for n := 1 to NumXCBoxSizes do
139      if f26  >= IntfcCost[n]^.NumLines
140      then f26 := IntfcCost[n]^.NumLines; { F-side cable size }
141
142
143      tmp3 := zero;
144      for n := 1 to NumXCBoxSizes do
145      if (d26+f26)  >= IntfcCost[n]^.NumLines  { match on interface size
           large enough to handle both cables }
146  {***}     then tmp3 := IntfcCost[n+1]^.cost;
147  {       then tmp3 := IntfcCost[n]^.cost;  }
148  {***}
```

```
60      d26  : double;
61      f26  : double;
        g26  : double;
62      lt1  : double;

*
*
*

128
129
130
131
132
133      f26 :=
           SA_array^[i]^.ResLines/fill_factor_fn(SA_array^[i]^.density,0) +
134            (SA_array^[i]^.BusLines - (one -
           PairsPerT1System/ChannelsPerT1System)*SA_array^[i]^.Switche
           dDS1 +
135          SA_array^[i]^.SpclAccessLines - (one -
           PairsPerT1System/ChannelsPerT1System)*SA_array^[i]^.SpclAcc
           essDS1)/
136            fill_factor_fn(SA_array^[i]^.density,0);
137
138      for n := 1 to NumXCBoxSizes do
139      if f26 + l26  >= IntfcCost[n]^.NumLines
140      then g26 := IntfcCost[n]^.NumLines; { F-side cable size }
141
142
143      tmp3 := zero;
144      for n := 1 to NumXCBoxSizes do
145      if g26  >= IntfcCost[n]^.NumLines  { match on interface size large
           enough to handle both cables }
146  {***}     then tmp3 := IntfcCost[n+1]^.cost;
147  {       then tmp3 := IntfcCost[n]^.cost;  }
148  {***}
```

6. Consistent with my October 30, 2001 testimony (Tr. at 4329-30), these modifications add approximately $0.10 to the loop cost.

7. This concludes my affidavit.

BRIAN F. PITKIN

Jennifer L. Torregrossa
Notary Public

My Commission Expires: March 31, 2003